

EXHIBIT 3

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF NEW JERSEY

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4
5 IN RE: JOHNSON & :
6 JOHNSON TALCUM POWDER :
7 PRODUCTS MARKETING, :
8 SALES PRACTICES, AND : NO. 16-2738
9 PRODUCTS LIABILITY : (FLW) (LHG)
10 LITIGATION :
11 :
12 THIS DOCUMENT RELATES :
13 TO ALL CASES :

14 VOLUME II

15 - - -

16 August 17, 2018

17 - - -

18 Continued videotaped
19 deposition of JOHN HOPKINS, Ph.D., taken
20 pursuant to notice, was held at the law
21 offices of Orrick, LLP, 51 West 52nd
22 Street, Philadelphia, Pennsylvania,
23 beginning at 9:01 a.m., on the above
24 date, before Michelle L. Gray, a
25 Registered Professional Reporter,
26 Certified Shorthand Reporter, Certified
27 Realtime Reporter, and Notary Public.

28 - - -

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John Hopkins, Ph.D.

Page 661

1 with Alice Blount. You said you didn't
2 know anything about it. Do you remember
3 that?

4 A. It wasn't familiar. But if
5 you can enlighten me, I'll be happy to
6 comment.

7 Q. Did you know that Alice
8 Blount was your consultant in the Coker
9 case?

10 A. I did not know that. No.
11 No.

12 Q. And I'll show you,
13 April 23rd, 1998. Take a look. Have you
14 seen this document before?

15 A. I think I have actually.
16 Yeah, this is a letter from Ms. Blount to
17 a law firm in Texas.

18 Q. All right. You didn't know
19 this letter was about the Coker case,
20 though, did you?

21 A. No. It's you just stated
22 that it is, although it doesn't say so
23 here.

24 Q. You see -- and the date of

John Hopkins, Ph.D.

Page 662

1 this is what, April 23rd, 1998?

2 A. That is the date on the
3 memo, yes.

4 Q. All right. And let's just
5 go through it. Did you know that Raymond
6 Hatcher was the lawyer for Johnson &
7 Johnson in the Coker case?

8 A. No. All I see is what's
9 written here. It says Hatcher at a law
10 firm in Texas.

11 MR. PLACITELLA: All right.

12 Do you have 220?

13 BY MR. PLACITELLA:

14 Q. Well, it says, "According to
15 your letter of March 31st, I have written
16 an enclosed report on the occurrence,
17 regulation, and up-to-date scientific
18 views of asbestos, amphiboles, and
19 inter-media fibers. I have also enclosed
20 copies of my 1990 and 1991 papers, one of
21 which I am sure that you already have.

22 "The 1991 paper was written
23 because I became aware that it was a
24 common opinion among industrial

John Hopkins, Ph.D.

Page 663

1 hygienists that industrial talcs were
2 better than pharmaceutical and cosmetic
3 talcs, because there was a regulation for
4 the former and not for the latter. I
5 knew that this was not the case and
6 wanted to set the record straight."

7 Did I read that correctly so
8 far?

9 A. You read what she wrote.
10 Yes.

11 Q. And she wrote, "Although my
12 papers report an improved method for
13 analysis, the determination of the sample
14 labeled 'I,' Johnson & Johnson's Vermont
15 talc, have been done by the traditional
16 methods as well."

17 And then she cites to her
18 paper. And she says, "As I told you, I
19 believe that Johnson & Johnson's talc
20 contains trace amounts of asbestos, which
21 are well below those specified by OSHA."

22 Do you see that?

23 A. That is what she wrote.
24 That's what she claimed, yes.